

BEFORE THE BOARD OF ENVIRONMENTAL REVIEW
OF THE STATE OF MONTANA

In the matter of the) NOTICE OF PUBLIC HEARING
amendment of ARM 17.38.101,) ON PROPOSED AMENDMENT
17.38.201A, 17.38.203,)
17.38.205, 17.38.208,) (PUBLIC WATER SUPPLY)
17.38.215, 17.38.216,)
17.38.225, and 17.38.234)
pertaining to public water)
and sewage system)
requirements)

TO: All Concerned Persons

1. On November 15, 2004, at 9:00 a.m., the Board of Environmental Review will hold a public hearing in Room 239/240, Metcalf Building, 1520 East Sixth Avenue, Helena, Montana, to consider the proposed amendment of the above-stated rules.

2. The Board will make reasonable accommodations for persons with disabilities who wish to participate in this public hearing or need an alternative accessible format of this notice. If you require an accommodation, contact the Board no later than 5:00 p.m., November 4, 2004, to advise us of the nature of the accommodation that you need. Please contact the Board Secretary at P.O. Box 200901, Helena, Montana 59620-0901; phone (406) 444-2544; fax (406) 444-4386; or email ber@state.mt.us.

3. The rules proposed to be amended provide as follows, stricken matter interlined, new matter underlined:

17.38.101 PLANS FOR PUBLIC WATER SUPPLY OR WASTEWATER SYSTEM (1) and (2) remain the same.

(3) As used in this rule, the following definitions apply in addition to those in 75-6-102, MCA.

(a) remains the same.

(b) "Main" means any line providing water or sewer to multiple service connections.

(b) remains the same, but is renumbered (c).

(d) "Service connection" means a line that provides water or sewer service to one building or living unit.

(c) through (h)(ii) remain the same, but are renumbered (e) through (j)(ii).

(4) ~~Before commencing~~ A person may not commence or continuing continue the construction, alteration, extension,

or operation of a public water supply system or wastewater system, until the applicant ~~shall~~ has submitted a design report along with the necessary plans and specifications for the system to the department or a delegated division of local government for its review and has received written approval. Two sets of plans and specifications are needed for final approval. Approval by the department or a delegated division of local government is contingent upon construction and operation of the public water supply or wastewater system consistent with the approved design report, plans, and specifications. Failure ~~of~~ to construct or operate the system ~~to operate~~ according to the approved plans and specifications or the department's conditions of approval is an alteration ~~that requires resubmittal of a design report, plans, and specifications for department approval~~ for purposes of this rule.

(a) through (15) remain the same.

AUTH: 75-6-103, MCA

IMP: 75-6-103, 75-6-112, 75-6-121, MCA

REASON: The proposed amendment to (3)(b) is necessary to define the term "main", as used in Circulars DEQ-1, DEQ-2, and DEQ-3. The Department receives many inquiries regarding the definition of this term as it influences various aspects of public water supply laws and rules.

The proposed amendment to (3)(d) is necessary to define the term "service connection", as used in Circulars DEQ-1, DEQ-2, and DEQ-3. The Department receives many inquiries regarding the definition of this term as it influences various aspects of public water supply laws and rules.

The proposed amendment to (4) is necessary to clarify who is accountable for construction that occurs prior to Department review and approval and to make the rule consistent with the intent of 75-6-112, MCA, which states: "A person may not: (3) commence or continue construction...." The effect of this amendment will clarify that any "person" modifying public water or wastewater systems prior to Department approval is in violation of this rule. The proposed amendment also clarifies that an approved system must be both constructed and operated in accordance with the approved plans and specifications and department conditions of approval. This is necessary to help ensure that approved systems are properly constructed and operated.

17.38.201A INCORPORATION BY REFERENCE--PUBLICATION DATES AND AVAILABILITY OF REFERENCED DOCUMENTS (1) Unless

expressly provided otherwise, in this subchapter where the board has:

(a) adopted and incorporated by reference a federal regulation, the reference is to the July 1, ~~2001~~ 2003, edition of the Code of Federal Regulations (CFR);

(b) referred to a section of the Montana Code Annotated (MCA), the reference is to the ~~2001~~ 2003 edition of the MCA.

(c) through (4) remain the same.

AUTH: 75-6-103, MCA

IMP: 75-6-103, MCA

REASON: The proposed amendments to (1) are necessary to adopt by reference the current July 1, 2003, editions of the Code of Federal Regulations (CFR), and the Montana Code Annotated (MCA), and all the applicable changes made since the 2001 editions. The CFR changes are described in the following rules, as specific CFR sections are incorporated by reference, and the reason statements for each rule address the necessity for the particular CFR section adopted. The proposed incorporations of the CFR in this rulemaking are also necessary to allow the Department to enforce the public water supply statutes and to retain primacy for enforcement of safe drinking water laws. The policy of the Montana legislature has been for state agencies to retain primacy over environmental and public health programs.

17.38.203 MAXIMUM INORGANIC CHEMICAL CONTAMINANT LEVELS

(1) The board ~~hereby~~ adopts and incorporates by reference:

(a) 40 CFR 141.6(j) and 141.6(k), which set forth effective dates associated with a revised maximum contaminant level for arsenic;

~~(a) (b) 40 CFR 141.11 and 141.62(b), which set forth maximum contaminant levels for inorganic contaminants, except that 40 CFR 141.62(b)(16) is modified to read, "(16) Arsenic --0.010"; and~~

(b) and (c) remain the same, but are renumbered (c) and (d).

AUTH: 75-6-103, MCA

IMP: 75-6-103, MCA

REASON: The proposed addition of new (1)(a) is necessary to adopt effective dates for the revised arsenic maximum contaminant level (MCL), which was adopted in 2003. Sections 141.6(j) and (k) were not adopted by the Board because the effective dates for the arsenic MCL were contained in other rules adopted by reference. Although primacy questions with the EPA in regard to the failure to incorporate these sections

have been answered to EPA's satisfaction, it is necessary to adopt these sections for general clarification purposes.

The proposed amendment to (1)(a), renumbered (1)(b), will delete a state rule that has since been adopted in the federal rule, which the Board adopted by reference in 2003. Deletion of the state rule is necessary to eliminate a duplicative statement of the requirement.

17.38.205 MAXIMUM TURBIDITY CONTAMINANT LEVELS (1) The board ~~hereby~~ adopts and incorporates by reference 40 CFR 141.13, 141.73, ~~141.73(a)(1), and 141.173(a)(3),~~ 141.550, and 141.551, which set forth maximum contaminant levels for turbidity, except for the following changes:

(a) remains the same.

(b) The following ~~replace~~ replaces 40 CFR 141.73(a)(1) ~~and 141.73(a)(2), respectively:~~

~~(i) "For systems using conventional filtration or direct filtration, The the turbidity level of representative samples of the system's combined filtered water, measured at a representative entry point to the distribution system may not exceed~~ must be less than or equal to 0.5 NTU in at least 95% of the measurements taken each month, and may not at any time exceed 1.0 NTU.

~~(ii) (c) The following replaces 40 CFR 141.73(a)(2), and is also added at the end of 40 CFR 141.173(a)(1) and 141.551:~~
"For systems using conventional filtration or direct filtration, The the turbidity level of representative samples of a system's effluent from individual filters, measured at a point prior to mixing with effluent from other filters or other sources, may not exceed 0.5 NTU in at least 95% of the measurements taken each month, and may not at any time exceed 5.0 NTU. This requirement is not violated if the turbidity reading for the effluent from each individual filter is the first reading of the month that exceeds 0.5 NTU and the individual filter is taken off-line within 24 hours after the sample analysis that shows the exceedance."

(d) The first sentence in 40 CFR 141.551 is replaced with the following sentence: "Your system must meet three strengthened combined filter effluent turbidity limits."

(2) remains the same.

AUTH: 75-6-103, MCA

IMP: 75-6-103, MCA

REASON: The proposed deletion of 40 CFR 141.73(a)(1) from (1) is necessary to correct a duplicative adoption. The rule adopts by reference 40 CFR 141.73, so it is not necessary to specifically adopt 141.73(a)(1).

The proposed deletion of 40 CFR 141.173(a)(3) will have the effect of adopting by reference the full section, which

was inadvertently not adopted previously. The full section of the federal rule sets out filtration and disinfection requirements for public water supply systems serving more than 10,000 people. The Department has been requiring compliance with the full section because other federal rules, which have been incorporated by reference in Board rules, require compliance with 141.173. Adoption of the full section is necessary to ensure adequate treatment of water supply for these systems. In addition, a reference to the full section 141.173 is necessary here because the proposed amendments at (1)(c) affect 141.173(a)(1).

The proposed amendments to (1) also adopt 40 CFR 141.550 and 141.551, which set forth maximum contaminant levels for turbidity for systems serving fewer than 10,000 people. The proposed amendments to (1) are also necessary to adopt 40 CFR 141.550 and 141.551, which set forth maximum contaminant levels for turbidity for systems serving fewer than 10,000 people. These proposed amendments are necessary to require systems serving fewer than 10,000 people to now meet the same public health protection requirements that systems serving 10,000 or more people have been meeting since December 2001.

The proposed additions to (1)(b) and new (1)(c) are necessary to clarify the types of filtered systems to which these standards apply and to clarify what would constitute a turbidity exceedance. Subsection (1)(b) has also been reformatted into (1)(b) and (1)(c) for clarity.

New (1)(c) has been amended to apply an existing requirement for individual filtration to 40 CFR 141.173(a)(1) and 141.551, which set out filtration requirements for large and small systems respectively. This is not a substantive change, because the Department has been applying the individual filtration requirement to large and small systems under the existing rules. The proposed amendments will clarify that the existing individual filtration requirement applies to those systems. The individual filtration requirement is necessary to reduce the possibility that an individual filter in a combined filtration system would fail and not be detected. This amendment is necessary to clarify for persons reading 40 CFR 141.173(a)(1) and 141.551 that the state procedure for individual filtration still applies.

17.38.208 TREATMENT REQUIREMENTS (1) through (3) remain the same.

(4) The board ~~hereby~~ adopts and incorporates by reference the following:

(a) and (b) remain the same.

(c) 40 CFR 141.62(c), which sets forth BATs for inorganic contaminants, and 40 CFR 141.62(d), which sets forth small system compliance technologies (SSCT) for arsenic;

(d) through (n) remain the same.

(o) 40 CFR 141.170, which sets forth general treatment requirements in addition to the requirements in 141.70 for public water suppliers that use surface water; ~~and~~

(p) 40 CFR 141.173(b), which sets forth treatment requirements, in addition to the requirements in 40 CFR 141.72, for public water suppliers that use filtered surface water-;

(q) 40 CFR 141.500, which sets forth general treatment requirements, in addition to the requirements in 141.70, for public water suppliers that use surface water or GWUDISW and that serve fewer than 10,000 people;

(r) 40 CFR 141.501, which identifies the public water suppliers that are subject to the requirements of 40 CFR Part 141, Subpart T;

(s) 40 CFR 141.502 which stipulates the effective date for the requirements of 40 CFR Part 141, Subpart T, except that "January 14, 2005" is changed to "January 1, 2005";

(t) 40 CFR 141.503, which stipulates that public water suppliers that use surface water or GWUDISW and that serve fewer than 10,000 people must comply with the applicable requirements of 40 CFR Part 141, Subpart T;

(u) 40 CFR 141.510 and 141.511, which set forth requirements for construction of finished water storage reservoirs for public water suppliers that use surface water or GWUDISW and that serve fewer than 10,000 people;

(v) 40 CFR 141.520, 141.521 and 141.522, which stipulate that public water suppliers that use surface water or GWUDISW, do not provide filtration, and that serve fewer than 10,000 people must comply with the new watershed protection requirements of 40 CFR Part 141, Subpart T; and

(w) 40 CFR 141.552, which describes microbiological contaminant removal efficiencies that public water suppliers must demonstrate to obtain state approval of alternative filtration technologies.

AUTH: 75-6-103, MCA

IMP: 75-6-103, MCA

REASON: The proposed amendments to (4)(c) will incorporate by reference the best available technology (BAT) options for inorganic contaminants and the small system compliance technologies for arsenic. The proposed amendments are necessary to identify those treatments allowed to address treatment requirements and to allow small systems the treatment alternatives designed to address financial concerns of small systems.

The proposed addition of new (4)(q) will incorporate by reference the new general treatment requirements for systems using surface water or GWUDISW (ground water under the direct influence of surface water) and that serve fewer than 10,000 people (Subpart T systems). The proposed addition is necessary to ensure adequate treatment of Subpart T systems.

The proposed addition of new (4)(r) will describe what systems must meet the new Subpart T requirements. The proposed addition is necessary to identify what systems must meet the new requirements for surface water systems or GWUDISW systems that serve fewer than 10,000 people.

The proposed addition of new (4)(s) will describe the effective date by which Subpart T systems must meet the new treatment requirements. The proposed addition is necessary to ensure that Subpart T systems remain in compliance with treatment requirements.

The proposed addition of new (4)(t) requires systems to meet the new Subpart T requirements. The proposed addition is necessary to ensure that Subpart T systems remain in compliance with treatment requirements.

The proposed addition of new (4)(u) requires construction standards for finished water reservoirs for Subpart T systems.

The proposed addition is necessary to ensure that Subpart T systems are able to protect the water they have treated by storing it in an adequately constructed reservoir.

The proposed addition of new (4)(v) requires Subpart T systems that avoid filtration to meet the new watershed protection requirements. The proposed addition is necessary to ensure that Subpart T systems, avoiding filtration, are protecting the health of its users by protecting the quality of the water at its sources.

The proposed addition of new (4)(w) describes microbiological contaminant removal standards that Subpart T systems wishing state approval for alternate filtration technologies must be able to meet. The proposed addition is necessary to ensure that Subpart T systems are able to consider other filtration methods as long as a minimum standard is met.

17.38.215 BACTERIOLOGICAL QUALITY SAMPLES (1) The board ~~hereby~~ adopts and incorporates by reference the table in 40 CFR 141.21(a)(2), which sets forth total coliform monitoring frequency requirements.

(a) through (c) remain the same.

(d) A water supplier who is allowed to sample quarterly pursuant to (1)(c) ~~above~~ or who was authorized to conduct quarterly sampling on June 3, 1999, and is not required by the

department to sample more frequently, may continue to sample quarterly except that:

(i) through (6) remain the same.

AUTH: 75-6-103, MCA

IMP: 75-6-103, MCA

REASON: The proposed amendment to (1)(d) is necessary to clarify that systems that were once allowed to reduce their microbiological sampling frequency to a reduced rate (from monthly to quarterly) may later be required to increase that frequency if questions as to the safety of the system arise.

17.38.216 CHEMICAL AND RADIOLOGICAL QUALITY SAMPLES

(1) through (2) remain the same.

(3) The board ~~hereby~~ adopts and incorporates by reference the following monitoring and analytical requirements:

(a) 40 CFR 141.23, which sets forth sampling and analytical method requirements for inorganic chemicals except that 141.23(i) is replaced with the following:

"(i) Compliance with 40 CFR 141.11 or 141.62(b) (as appropriate) shall be determined based on the analytical result(s) obtained at each sampling point.

(A) through (E) remain the same, but are renumbered (1) through (5).

(6) Compliance with the maximum contaminant levels for nitrate and nitrite is determined based on one sample if the levels of these contaminants are below the MCLs. If the levels of nitrate and/or nitrite exceed the MCLs in the initial sample, a confirmation sample is required in accordance with paragraph (f)(2) of this section, and compliance shall be determined based on the average of the initial and confirmation samples.

(7) Arsenic sampling results will be reported to the nearest 0.001 mg/L."

(b) through (6) remain the same.

AUTH: 75-6-103, MCA

IMP: 75-6-103, MCA

REASON: The proposed amendments to (3)(a)(i) are necessary to correct numbering errors in the existing rule format. The proposed amendments are necessary to adopt the specific language as quoted directly from the CFR. The numbering changes were inadvertently made during the last rulemaking process to meet Montana Secretary of State

formatting guidelines. The renumbering above will make the language appear as published in the CFR.

The proposed addition of (3)(a)(i)(6) is necessary to readopt the nitrate/nitrite MCL determination process that was inadvertently removed during the last rulemaking process. This proposed addition is necessary so systems are able to determine whether they are meeting the public health standard as defined by the MCL.

The proposed addition of (3)(a)(i)(7) adopts a reporting level requirement for arsenic. Because this requirement was expressed in other areas of the rules adopted by reference, the Board did not specifically adopt this section in the past.

However, at EPA's request, this section is proposed for adoption to avoid a disparity between federal and state rules.

The adoption is necessary to help prevent public confusion about what are the applicable requirements.

17.38.225 CONTROL TESTS (1) through (5) remain the same.

(6) The board ~~hereby~~ adopts and incorporates by reference the following:

(a) through (c) remain the same.

(d) 40 CFR 141.174, which sets forth filtration sampling requirements; ~~and~~

(e) 40 CFR 141.530, 141.531, 141.532, 141.533, 141.534, 141.535, 141.536, 141.540, 141.541, 141.542, 141.543 and 141.544, which set forth requirements for disinfection profiling and benchmarking for public water suppliers using surface water or GWUDISW and that serve fewer than 10,000 people;

(f) 40 CFR 141.553, which describes turbidity monitoring provisions for systems that utilize lime softening;

(g) 40 CFR 141.560, which describes individual filter monitoring requirements for public water suppliers that utilize direct or conventional filtration treatment;

(h) 40 CFR 141.561, which describes monitoring requirements for public water suppliers when continuous turbidity monitoring equipment fails;

(i) 40 CFR 141.562, which describes turbidity monitoring requirements for public water suppliers that utilize two or fewer filters; and

(e) remains the same, but is renumbered (j).

(7) remains the same.

AUTH: 75-6-103, MCA

IMP: 75-6-103, MCA

REASON: The proposed addition of (6)(e) adopts new requirements for Subpart T systems, detailing disinfection profiling and benchmarking. These proposed additions are necessary to ensure that existing treatment standards are not reduced while meeting new requirements.

The proposed addition of new (6)(f) describes turbidity monitoring requirements for Subpart T systems that lime-soften. The proposed addition is necessary to ensure that Subpart T systems, using lime softening, are not adversely impacted by elevated turbidity readings that may be due to the addition of the lime-softening agent.

The proposed addition of new (6)(g) describes individual filter monitoring requirements for direct or conventional filtration. The proposed addition is necessary to ensure that individual filters are functioning as designed and producing safe water.

The proposed addition of new (6)(h) describes turbidity monitoring requirements when continuous monitoring is unavailable. The proposed addition is necessary to ensure that filters are functioning as designed and producing safe water.

The proposed addition of new (6)(i) describes turbidity monitoring requirements for Subpart T systems with two or fewer filters. The proposed addition is necessary to ensure that filters are functioning as designed and producing safe water.

17.38.234 TESTING AND SAMPLING RECORDS AND REPORTING REQUIREMENTS (1) and (2) remain the same.

(3) Actual laboratory reports may be kept or data may be transferred to tabular summaries, provided the following information is included:

(a) through (d) remain the same.

~~(e) 40 CFR 141.76(b) and (d), which set forth reporting and recordkeeping requirements for the recycle provisions;~~

(f) through (h) remain the same, but are renumbered (e) through (g).

(4) and (5) remain the same.

(6) The board ~~hereby~~ adopts and incorporates by reference the following:

(a) through (c) remain the same.

(d) 40 CFR 141.75, which sets forth reporting requirements for public water supplies that use surface water ~~sources~~ or GWUDISW, except for the following changes:

(i) and (ii) remain the same.

(e) 40 CFR 141.76(b) and (d), which set forth reporting and recordkeeping requirements for the recycle provisions;

(e) remains the same, but is renumbered (f).

~~(f)~~ (g) 40 CFR 141.134, which, in addition to 40 CFR 141.31, sets forth reporting requirements for disinfection byproducts; and

~~(g)~~ (h) 40 CFR 141.175, which, in addition to 40 CFR 141.75, sets forth reporting requirements for public water supplies that serve 10,000 or more people that use surface water sources or GWUDISW;

(i) 40 CFR 141.563, which sets forth reporting and follow-up actions that public water suppliers that utilize surface water or GWUDISW, serve fewer than 10,000 people, and are required to filter must take when certain individual filter turbidity limits are exceeded;

(j) 40 CFR 141.564, which sets forth reporting and follow-up actions that public water suppliers that utilize surface water or GWUDISW, serve fewer than 10,000 people, are required to filter, and utilize lime softening must take when certain individual filter turbidity limits are exceeded;

(k) 40 CFR 141.570, which, in addition to 40 CFR 141.75, sets forth general reporting requirements for public water suppliers that utilize surface water or GWUDISW and serve fewer than 10,000 people; and

(l) 40 CFR 141.571, which, in addition to 40 CFR 141.75, sets forth general recordkeeping requirements for public water suppliers that utilize surface water or GWUDISW and that serve fewer than 10,000 people.

(7) Upon request by the department, a public water supplier shall ensure that recommendations of a certified professional engineer required under 40 CFR 141.175 or 40 CFR 141.563 are implemented through consultation and technical assistance provided by the department or by a third party approved by the department.

(7) and (8) remain the same, but are renumbered (8) and (9).

AUTH: 75-6-103, MCA

IMP: 75-6-103, MCA

REASON: The proposed deletion of (3)(e) corrects an error made during the original rule adoption. Sections 40 CFR 141.76(b) and (d) were inadvertently adopted under (3)(e), which pertain to actual laboratory reports, but should have been adopted under (6), the incorporations by reference section. The cites are being deleted from (3) and adopted under (6) to correct that mistake.

The proposed amendment to (6)(d) is necessary to clarify what systems must meet the requirements of this rule. Surface water systems and systems deemed to be ground water under the direct influence of surface water (GWUDISW) are classified as

Subpart H systems, which means they must meet the surface water treatment requirements. This proposed amendment is necessary to clarify that GWUDISW systems must also meet the requirements adopted in this rule.

The proposed amendment of (6)(h) clarifies the reporting requirements for Subpart H systems that serve at least 10,000 people. The proposed amendment is necessary to ensure systems serving at least 10,000 people do not report under the Subpart T requirements.

The proposed addition of new (6)(i) describes follow-up actions Subpart T systems must take when certain individual filter turbidity limits are exceeded. The proposed addition is necessary to ensure that filters are functioning as designed and producing safe water.

The proposed addition of new (6)(j) describes follow-up actions Subpart T systems that use lime softening must take when certain individual filter turbidity limits are exceeded.

The proposed addition is necessary to ensure that filters are functioning as designed and producing safe water.

The proposed amendment of (6)(k) clarifies the reporting requirements for Subpart H systems that serve fewer than 10,000 people. The proposed amendment is necessary to ensure systems serving fewer than 10,000 people report under the Subpart T requirements.

The proposed amendment of (6)(l) clarifies the recordkeeping requirements for Subpart H systems that serve fewer than 10,000 people. The proposed amendment is necessary to ensure Subpart T systems keep records that indicate the quality of the water produced.

The proposed addition of new (7) would allow the Department to require corrections to be made to problems identified during comprehensive performance evaluations. This proposed addition is necessary to ensure that filters are functioning as designed and producing safe water.

4. Concerned persons may submit their data, views or arguments, either orally or in writing, at the hearing. Written data, views or arguments may also be submitted to the Board of Environmental Review, P.O. Box 200901, Helena, Montana 59620-0901, faxed to (406) 444-4386 or emailed to the Board Secretary at ber@state.mt.us and must be received no later than 5:00 p.m, November 18, 2004. To be guaranteed consideration, mailed comments must be postmarked on or before that date.

5. Thomas Bowe, attorney for the Board, has been designated to preside over and conduct the hearing.

6. The Board maintains a list of interested persons who wish to receive notices of rulemaking actions proposed by this agency. Persons who wish to have their name added to the list shall make a written request that includes the name and mailing address of the person to receive notices and specifies that the person wishes to receive notices regarding: air quality; hazardous waste/waste oil; asbestos control; water/wastewater treatment plant operator certification; solid waste; junk vehicles; infectious waste; public water supplies; public sewage systems regulation; hard rock (metal) mine reclamation; major facility siting; opencut mine reclamation; strip mine reclamation; subdivisions; renewable energy grants/loans; wastewater treatment or safe drinking water revolving grants and loans; water quality; CECRA; underground/above ground storage tanks; MEPA; or general procedural rules other than MEPA. Such written request may be mailed or delivered to the Board of Environmental Review, 1520 E. Sixth Ave., P.O. Box 200901, Helena, Montana 59620-0901, faxed to the office at (406) 444-4386, emailed to the Board Secretary at ber@state.mt.us, or may be made by completing a request form at any rules hearing held by the Board.

7. The bill sponsor notice requirements of 2-4-302, MCA, do not apply.

Reviewed by:

BOARD OF ENVIRONMENTAL REVIEW

James M. Madden

JAMES M. MADDEN
Rule Reviewer

By: Joseph W. Russell

JOSEPH W. RUSSELL, M.P.H.,
Chairman

Certified to the Secretary of State, October 8, 2004.